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16 GARY FUNG and ISOHUNT WEB TECHNOLOGIES, INC.

17 **UNITED STATES DISTRICT COURT**
18 **CENTRAL DISTRICT OF CALIFORNIA**

19 COLUMBIA PICTURES INDUSTRIES,
20 INC., et al.,

21 Plaintiffs,

22 v.

23 GARY FUNG, et al.,

24 Defendants.
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Case No. CV 06-5578-SVW (JCx)

**DEFENDANTS GARY FUNG AND
ISOHUNT WEB TECHNOLOGIES,
INC.'S PRETRIAL DISCLOSURE OF
WITNESSES**

Pretrial Conference: October 28, 2013
Trial Date: November 5, 2013

Pursuant to Local Rule 16-2.4, Defendants Gary Fung and isoHunt Web Technologies, Inc., (“Defendants”) through their attorneys, submit this list of trial witnesses. Defendants reserve the right to supplement, modify or amend this witness list as necessary, depending upon the witness or exhibit designations of Plaintiffs, the outcome of the parties’ conferences on pretrial matters, in response to Plaintiffs’ case, and any applicable rulings of the Court, or other developments. Defendants also reserve the right to designate deposition testimony should any of the listed witnesses become unavailable.

Gary Fung

Robin Johnson

Allen Parker

Steven Gribble (expert witness)

Christian Tregillis (expert witness): Mr. Tregillis will analyze financial, economic and accounting issues related to claims by Plaintiffs against Defendants for copyright infringement. The scope of his testimony will depend upon which documents by Plaintiffs are ultimately produced, including regarding revenue, profits and licensing regarding the alleged works-in-suit, which will require Magistrate Judge Chooljian to resolve the pending disputes relating to financial and valuation discovery relating to the calculation. Once additional discovery becomes available, Mr. Tregillis expects to be able to offer an informed analysis of statutory damages and factors relevant to such a determination, as well as actual damages and the calculation of Defendants' profits, and will thereafter provide his report.

Koleman Strumpf (expert witness): Mr. Strumpf has conducted economic studies on the impact of file-sharing and unauthorized downloads on content sales, the balance of positive and negative effects, and has conducted extensive research on BitTorrent technology. Mr. Strumpf intends to offer testimony on these topics, including with respect to movies released in the theatre as well as television episodes. Plaintiffs just identified their current list of claimed works last week, which directly

1 impacts Mr. Strumpf's analysis. The scope of his testimony will also depend upon
 2 which documents by Plaintiffs are ultimately produced, including regarding sales of
 3 the alleged works-in-suit, which will require Magistrate Judge Chooljian to resolve the
 4 pending disputes relating to financial and valuation discovery relating to the
 5 calculation. Mr. Strumpf intends to incorporate additional relevant discovery once
 6 produced, and will thereafter provide his report.

7 ***Plaintiffs' witnesses** (by designation)
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12 Dated: October 7, 2013

WINSTON & STRAWN LLP

14 By: /s/ Erin R. Ranahan

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